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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DWIGHT BOUSE,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:24-cv-00687-APG-DJA

**Order to Extend
Discovery Deadlines
(Third Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. The parties have conducted discovery diligently and in good faith. This is the second request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Plaintiff made his initial disclosures on August 27, 2024.
2. Defendant made its initial disclosures on August 30, 2024.
3. Plaintiff served a Request for Production on Defendant on October 15, 2024.
4. Defendant served its first supplemental disclosure of witnesses and documents on October 23, 2024.

1 5. Defendant served its First Request for Interrogatories and Requests for
2 Production on Plaintiff on November 5, 2024.

3 6. Defendant served its second supplemental disclosure of witnesses and
4 documents and responses to Plaintiff's Request for Production on November
5 14, 2024.

6 7. Defendant noticed the depositions of Plaintiff and his wife for February 20,
7 2025.

8 8. Plaintiff served his first supplemental disclosure of witnesses and documents
9 on January 29, 2025

10 9. Plaintiff served his second supplemental disclosure of witnesses and
11 documents on January 30, 2025.

12 10. Defendant has requested additional HIPAA authorizations to be able to fully
13 obtain Plaintiff's pertinent medical records.

14 11. Defendant took the depositions of Plaintiff and his wife on February 20, 2025.

15 **DISCOVERY REMAINING**

16 The parties need to obtain additional medical records from recently disclosed
17 private providers and the military, take depositions of the parties, designate initial and
18 rebuttal experts, and depose experts and other witnesses.

19 The parties reserve the right to engage in any other discovery permitted by
20 applicable rules and within the revised discovery deadlines if the court approves this
21 stipulation.

22 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

23 Since the Order granting the Stipulation to Continue to Discovery (ECF No. 17),
24 the parties have been working diligently to advance discovery. Currently, the parties are
25 comparing and coordinating schedules to depose Dr. Christensen. In addition, Defendant
26 is in the process of scheduling and noticing the deposition of Nurse Lili Picar that treated
27 Plaintiff.

28 Per recent guidance and executive orders, this extension will allow additional time

for the Defendant to obtain and secure an expert to review over 5,000 pages of medical records. Additionally, the extension will allow the parties to coordinate depositions of Plaintiff, witnesses and experts.

The parties' counsel conferred and agreed that a sixty (60) day extension would be proper. The parties agree that neither party will be prejudiced by the proposed extension, and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Expert Disclosure	April 14, 2025 ¹	June 13, 2025
Rebuttal Expert Disclosure	May 14, 2025	July 14, 2025
Discovery Cutoff	June 13, 2025	August 12, 2025
Dispositive Motions	July 14, 2025 ²	September 12, 2025
Proposed Joint Pretrial Order	August 13, 2025	October 13, 2025³

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¹ April 12, 2025 is a Saturday.

² July 13, 2025 is a Sunday.

³ October 12, 2025 is a Sunday.

1 This request for an extension of time is not sought for any improper purpose
2 including delay. This is the second request for an extension of discovery deadlines in this
3 matter.

4 Respectfully submitted this 17th day of March 2025.

5 PAUL PADDA LAW, PLLC

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10 *Attorneys for Plaintiff*

Attorneys for Defendant

11 **IT IS SO ORDERED:**

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DANIEL J. ALBREGTS
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: March 18, 2025
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